

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
ANN ARBOR DIVISION**

CASE NO.: 2:21-cv-10083-SDD-APP

PANORAMIC STOCK IMAGES, LTD.,
DBA PANORAMIC IMAGES,

Plaintiff,

v.

BIG ROB'S BAIL BOND AGENCY LLC,

Defendant.

MOTION FOR EXTENSION OF TIME

Plaintiff PANORAMIC STOCK IMAGES, LTD., DBA PANORAMIC IMAGES by and through its undersigned counsel, hereby moves this Honorable Court for an extension of time to TO SERVE DEFENDANT, and as grounds therefore states as follows:

1. Plaintiff filed the Complaint with this court on January 11, 2021 [DE 01];
2. Plaintiff requested a summons be issued for Defendant BIG ROB'S BAIL BOND AGENCY LLC ("Big Rob") also on January 11, 2021 [DE 01-05];
3. The court issued a summons for Big Rob on January 12, 2021 [DE 03];
4. This rules established a deadline to serve Big Rob before or on Monday April 12, 2021.
5. Plaintiff attempted service on Big Rob on Thursday 14, 2021 at Defendant's last known place of business, and the registered agent address provided to the Secretary of State. According to the process server's affidavit the address was no longer valid, and the current

tenants did not match the registered agent listed for Big Rob. Big Rob has failed to provide an updated address to the Secretary of State.

6. Plaintiff attempted service again for Big Rob on February 24, 2021, at an alternative address for Defendant, located through its own investigation. According to the process server's affidavit, the address was not valid and the current tenants did not match the registered agent listed for Big Rob.

7. Plaintiff attempted service by delivering a copy of the as-filed complaint and issued summons with FEDEX adult signature requirements to a third address associated with Big Rob. The package was returned undelivered on or around March 12, 2021.

8. Attached hereto as Exhibit A are copies of the affidavits of due diligence and FEDEX shipping results.

9. Plaintiff is currently seeking to effect service against Big Rob through the Michigan State Secretary of Service but is not confident the service will be fully rendered by the current deadline. Attached hereto as Exhibit B is a copy of the cover letter and certified mail tracking information for the mail package to Michigan's Division of Corporations.

10. Plaintiff requests and additional thirty (30) days to effect service against Defendant and for effecting service through the Michigan Secretary of State, in view of Plaintiff's difficulty in serving Big Rob caused by Big Rob's failure to update its corporate records with the Secretary of State.

WHEREFORE, Plaintiff PANORAMIC STOCK IMAGES, LTD., DBA PANORAMIC IMAGES prays this Honorable Court for an additional thirty (30) days for effecting service against Big Rob up to and including May 10, 2021.

DATED: April 12, 2021

Respectfully submitted,

/s/ Joseph A. Dunne

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*Counsel for Plaintiff Panoramic Stock Images, Ltd.,
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CERTIFICATE OF SERVICE

The undersigned does hereby certify that on April 12, 2021, a true and correct copy of the foregoing document was served by electronic mail by the Court's CM/ECF System to all parties listed below on the Service List.

/s/ Joseph A. Dunne

JOSEPH A. DUNNE

SERVICE LIST

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